

## I. INTRODUCTION

A five-year review was conducted for the Formerly Utilized Sites Remedial Action Program (FUSRAP) St. Louis Sites (SLS). This five-year review comes at a time when site response actions are being implemented and construction is ongoing. This review, therefore, is not typical of the reviews that will be conducted over the long-term management period. The typical long-term management five-year review process is designed to examine remedies that are in place. In the future, after construction completion, five-year review reports will examine land use, institutional control monitoring and enforcement, long-term monitoring, and other long-term activities.

The SLS are composed of two locations designated as the St. Louis Downtown Site (SLDS) and the North St. Louis County sites. The five-year period covered by this review is from September 1998 through August 2003. The methods, findings, recommendations, and conclusions of the five-year review are documented in this five-year review report. This is the first five-year review conducted for the FUSRAP St. Louis Sites.

As the lead agency for the St. Louis Sites, the U. S. Army Corps of Engineers, St. Louis District (USACE) prepared this five-year review report pursuant to Section 121 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA §121), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) and to the National Oil and Hazardous Substances Pollution Contingency Plan, more commonly called the National Contingency Plan (NCP). CERCLA §121 (c) states the following:

*If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.*

The U.S. Environmental Protection Agency (USEPA) interpreted this requirement further in the NCP at 40 Code of Federal Regulations (CFR) 300 [specifically 40 CFR 300.430(f)(4)(ii)], which states the following:

*If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.*

The USACE conducted a five-year review of the response actions implemented at the Accessible Soil and Ground-Water Operable Unit (OU) of the SLDS and the North St. Louis County sites in St. Louis, Missouri. This review was conducted from January 2003 through August 2003 and covers the period from September 1998 through August 2003. The results of the review are documented in this report. USACE was assisted in the five-year review by the following entities: USEPA Region VII and the Missouri Department of Natural Resources (MDNR). USEPA

Region VII and MDNR provided comments and suggestions on the analyses presented in this five-year review report.

From April 8 to 10, 2003, site inspections were conducted by USACE at the North St. Louis County sites as part of the five-year review. The following individuals participated in the site inspection: J. Mattingly, USACE; S. Roberts, USACE; D. Wall, USEPA Region VII; and J. Groboski, MDNR.

On May 8 and 9, 2003, a site inspection was conducted by USACE at the SLDS as part of the five-year review. The following individuals participated in the site inspection: J. Mattingly, USACE; G. Allen, USACE; D. Wall, USEPA Region VII; and J. Wade, MDNR.

This is the first five-year review for the SLS. As stated previously, this five-year review addresses the remedial action conducted at the SLDS Accessible Soil and Ground-Water OU and removal actions conducted at the North St. Louis County sites. The trigger date for the five-year review is September 8, 1998, the day when field operations for the remedial action at the SLDS began. The five-year review of the Accessible Soil and Ground-Water OU of the SLDS is being conducted pursuant to statute because the remedial action at this OU is a post-SARA remedial action that, when complete, will leave hazardous substances, pollutants, or contaminants on-site above levels that allow for unlimited use and unrestricted exposure.

There is yet no triggering action for the other OU at the SLDS, the Inaccessible Soil OU. The buildings and inaccessible soil that comprise the Inaccessible Soil OU will be addressed under a future CERCLA action. USACE is currently developing the approach to issue a Record of Decision (ROD) for the Inaccessible Soil OU. The Inaccessible Soil ROD for the SLDS has not yet been completed. EPA and MDNR will be invited to participate in this process. As of August 2003, only removal actions have taken place at the North St. Louis County sites. The five-year review of the North St. Louis County sites is being conducted as a matter of USEPA policy because a removal action is taking place at a site that is on the National Priorities List (NPL) [the St. Louis Airport Site (SLAPS) and the Hazelwood Interim Storage Site (HISS) and Futura Coatings]. Thus far, no remedial action has taken place at the North St. Louis County sites.